

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARINA ESPÍRITU, et als,

Plaintiffs,

v.

COMISIÓN ESTATAL DE ELECCIONES
and JESSIKA PADILLA RIVERA, in her
official capacity as Alternate President of the
Comisión Estatal de Elecciones, et als,

Defendants.

CIVIL NO. 24-CV-01446 (MAJ)

TEMPORARY RESTRAINING
ORDER REQUESTED

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65, Plaintiffs, by and through their undersigned counsel, hereby move for the issuance of a Temporary Restraining Order and a Preliminary Injunction, directing Defendants to implement policies allowing citizens to safely register for the elections of November 5, 2024 until 30 days prior to the election date which is October 6, 2024, and require Defendants, their officers, employees, and agents, all persons acting in active concert or participation with Defendants, or under Defendants' supervision, direction, or control, and all persons within the scope of Fed. R. Civ. P. 65, to implement this order by:

- (a) Extending the deadline for registration for the general elections until October 6, 2024;
- (b) Updating all public education materials, including written, online, and on-air, to reflect the above deadline extension;
- (c) Ordering the Commonwealth of Puerto Rico to allocate all necessary budget and personnel to guaranty the right to vote of the people of Puerto Rico on November 5 Federal Rule of Civil Procedure 65 provides for the issuance of a temporary restraining order under circumstances such as those that exist in the present case. In support of the

Motion, Plaintiffs rely upon the accompanying *Memorandum of Fact and Law*, as well as the exhibits thereto, including the declarations of Plaintiffs.

- (d) Grant Plaintiffs an urgent argumentative hearing in which all the requirements could be fully discussed, and such other relief that could include an evidentiary hearing, if necessary, as the Court may deem just and proper.

Dated: September 23, 2024
San Juan, Puerto Rico

Respectfully submitted:

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***Pro Hac Vice* Application to be filed

CERTIFICATION

I hereby certify that I filed the within document via the ECF system on September 23, 2024, and that it is available for viewing and downloading to all counsel of record and that I provided the within documents by email on September 23, 2020 to:

HON. DOMINGO EMANUELLI HERNÁNDEZ
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